

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

MAIN STREET SOFTWARES, INC.,

Plaintiff

v.

MONETA CORPORATION, et al.,

Defendants.

Civil Action No. 1:10cv00045 (AJT/TRJ)

JOINT REPORT AND PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f)

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and this Court's April 1, 2010 Order, Plaintiff Main Street Softworks, Inc. ("Plaintiff") and Defendants Moneta Corporation and Remitgate, LLC ("Defendants"), by counsel, hereby submit this Joint Report and Proposed Discovery Plan in anticipation of the Rule 16(b) conference scheduled for April 28, 2010:

Rule 26(f) Conference

Counsel for the parties conferred as required by Rule 26(f) on and prior to April 21, 2010.

Initial Disclosures

The parties shall exchange initial disclosures as required by Rule 26(a)(1) on or before May 12, 2010.

Discovery

All discovery shall be completed on or before August 13, 2010 and shall be subject to the limitations set forth in the Court's April 1, 2010 Order, the Federal Rules of Civil Procedure, and the Local Rules of this Court. All written discovery shall be served in time to assure that it is

answered before the deadline for completion of discovery. The parties will conduct discovery on all subjects raised in the pleadings. Discovery will not be conducted in phases.

Expert Discovery

Pursuant to Local Rule 26(D), the parties agree that the expert disclosures required by Rule 26(a)(2) shall be made as follows:

Plaintiff's Expert(s): June 21, 2010

Defendant's Expert(s): July 12, 2010

Rebuttal Expert(s): July 26, 2010

Electronically Stored Information

Discovery of such information is governed by Fed.R.Civ.P. 34(b)(2)(E).

Claims of Privilege

Assertion of claims of privilege after production is governed by Fed.R.Civ.P. 26(b)(5)(B). Withholding of discoverable information on the basis of attorney/client privilege on work product immunity is governed by Fed.R.Civ.P. 26(b)(5)(A).

Limitations On Discovery

The parties agree that no changes should be made to the limitations imposed by the Federal Rules, Local Rules and Scheduling Order of April 1, 2010.

Protective Order

The parties agree that an appropriate protective order should be entered to protect confidential business information. Counsel for the parties will work together to reach an agreed upon order under Local Civil Rule 5 for the Court's consideration.

Trial by Magistrate Judge

The parties do not consent to trial before a Magistrate Judge.

Settlement

The parties acknowledge that they have discussed their claims and defenses and the possibility of settlement with their respective counsel. Mediation is a possibility.

Dated: April 21, 2010

Respectfully Submitted,

/s/ David Ludwig

Thomas M. Dunlap (VSB #44016)
David Ludwig (VSB #73157)
Dunlap, Grubb & Weaver, PLLC
199 Liberty Street, SW
Leesburg, VA 20175
Phone: (703) 777-7319
Fax: (703) 777-3656
tdunlap@dglegal.com
dludwig@dglegal.com
Attorneys for Plaintiff
Main Street Softworks, Inc.

/s/ Mark L. Hogge

Mark L. Hogge (VSB # 23946)
Shailendra Maheshwari (*pro hac vice*)
Greenburg Traurig, LLP
2101 L Street, N.W., Suite 1000
Washington, D.C. 20037
Phone: (202) 530-8591
Fax: (202) 331-3101
hoggem@gtlaw.com
maheshwaris@gtlaw.com
Attorneys for Defendants
Moneta Corp. and Remitgate, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April 2010, I caused the foregoing JOINT REPORT AND PROPOSED DISCOVERY PLAN PURSUANT TO RULE 26(f) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Mark L. Hogge, Esq.
Shailendra Maheshwari, Esq.
Greenburg Traurig, LLP
2101 L Street, N.W., Suite 1000
Washington, D.C. 20037
Phone: (202) 530-8591
Fax: (202) 331-3101
hoggem@gtlaw.com
maheshwaris@gtlaw.com
Attorneys for Defendants
Moneta Corp. and Remitgate, LLC

/s/ David Ludwig
David Ludwig (VSB #73157)
Dunlap, Grubb & Weaver, PLLC
199 Liberty Street, SW
Leesburg, VA 20175
(703) 777-7319
(703) 777-3656 (fax)
dludwig@dglegal.com
Attorney for Plaintiff Main Street Softworks, Inc.